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Senate Policy and Steering Committee on Ways and Means  
201 The Capitol  
404 S. Monroe Street  
Tallahassee, FL 32399-1100

Dear Senator:

Audubon has significant concerns that the definition of urban areas included in SB 360 will diminish important consideration for wildlife in the growth management reviews of rural portions of the counties affected by this bill.

Senate Bill 360 would currently exempt Dade, Broward, Palm Beach, Orange, Pinellas, Hillsborough and Duval counties from Development of Regional Impact (DRI) review, and reduce the Department of Community Affairs' (DCA) review authority over comprehensive plan amendments. It would additionally eliminate "transportation concurrency" in these same areas.

We do not have concerns for wildlife related to the elimination of transportation concurrency requirements in these areas, nor do we have concerns regarding the relaxation of DRI review in truly urban areas.

Unfortunately, the broad inclusion of these counties in their entirety will allow the application of these relaxed standards to substantial rural areas within their boundaries. These rural areas which are mis-defined as "urban" include some very important intact ecosystems, such as the Everglades, the Green Swamp, the Wekiva ecosystem, the St. Johns River marshes and Econlockhatchee River ecosystem. The DRI process is essential to ensuring that wildlife and habitat impacts are minimized and mitigated. This bill in its current form would have the unintended effect of diminishing consideration given to wildlife and habitat as part of large area development proposal reviews in truly rural areas.

We hope that the committee will consider amending this bill to refine the definition of "urban," by utilizing census tracts as the defining unit for density thresholds or by limiting application of these exemptions to the urban development boundaries these counties employ. This would ensure that the intended relief of the bill would be realized in truly urban areas, without the concomitant relaxation of wildlife protections in rural areas.

Thank you for your consideration, on behalf of Audubon and Florida's wildlife.

Sincerely,

Eric Draper  
Deputy Director